28

1 2 3 4 5 6 7 8	DIANA S. EBRON, ESQ. Nevada Bar No. 10580 E-Mail: diana@kgelegal.com JACQUELINE A. GILBERT, ESQ. Nevada Bar No. 10593 E-Mail: jackie@kgelegal.com KAREN L. HANKS, ESQ. Nevada Bar No. 9578 E-Mail: karen@kgelegal.com KIM GILBERT EBRON 7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139-5974 Telephone: (702) 485-3300 Facsimile: (702) 485-3301 Attorney for Defendant/Counterclaimant/Cross-SFR Investments Pool 1, LLC	Claimant,
9	UNITED STATES DISTRICT COURT	
10	DISTRICT OF NEVADA	
11		
12 13	U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR BANC OF AMERICA FUNDING 2006-G TRUST,	Case No.: 2:17-cv-01500-JAD-PAL
14	Plaintiff,	STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE REPLIES
15	vs.	IN SUPPORT OF MOTIONS FOR SUMMARY JUDGMENT AND RESPONSE TO OBJECTION [ECF NOS.
16 17	SFR INVESTMENTS POOL 1, LLC, a Nevada limited-liability company; TORREY PINES RANCH ESTATES HOMEOWNERS	29, 30, 32 & 38] (FIRST REQUEST)
18	ASSOCIATION, a Nevada non-profit corporation; NEVADA ASSOCIATION	(
19	SERVICES, INC., a Nevada corporation,	
20	Defendants.	
21	SFR INVESTMENTS POOL 1, LLC, a Nevada limited liability company,	
22	Counterclaimant/Cross-Claimant,	
23	VS.	
24	U.S. BANK NATIONAL ASSOCIATION, AS	
25	TRUSTEE FOR BANC OF AMERICA FUNDING 2006-G TRUST; PETER	
26	NGUYEN, an individual,	
27	Counter-Defendant/Cross-Defendant.	

# 7625 DEAN MARTIN DRIVE, SUITE 110 LAS VEGAS, NEVADA 89139

(702) 485-3300 FAX (702) 485-3301

### STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE REPLIES IN SUPPORT OF MOTIONS FOR SUMMARY JUDGMENT AND RESPONSE TO **OBJECTION [ECF NOS. 29, 30, 32 & 38]**

Plaintiff/Counter-Defendant U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE **FOR BANC** AMERICA **FUNDING** 2006-G TRUST ("U.S. Defendant/Counterclaimant/Cross-Claimant SFR INVESTMENTS POOL 1, LLC ("SFR") [collectively, with Defendant TORREY PINES RANCH ESTATES HOMEOWNERS ASSOCIATION ("HOA")<sup>1</sup>, the "parties"], by and through their respective counsel of record, hereby respectfully submit this Stipulation and Order, pursuant to LR IA 6-1 and LR 7-1, to extend the deadline for the parties to file their Replies in support of their respective Motions for Summary Judgment (the "MSJs") [ECF Nos. 29, 30 & 32], which were all filed on August 8, 2018, as well as U.S. Bank's Response to SFR's Objection to U.S. Bank's Request for Judicial Notice [ECF No. 38], which was filed concurrently with SFR's MSJ. This is the first request for an extension of the foregoing deadline.

U.S. Bank filed its Response [ECF No. 34] to HOA's MSJ [ECF No. 29] on August 29, 2018. U.S. Bank also filed its Response [ECF No. 35] to SFR's MSJ [ECF No. 32] on August 29, 2018.

SFR filed its Response [ECF No. 36] to HOA's MSJ [ECF No. 29] on August 29, 2018. SFR also filed its Objection to U.S. Bank's Request for Judicial Notice [ECF No. 38] on August 29, 2018, as well as its Response [ECF No. 37] to U.S Bank's MSJ [ECF No. 30], with HOA filing a Joinder [ECF No. 41] thereto on September 5, 2018. SFR subsequently filed a Notice of Corrected Image/Document [ECF No. 42] for its Response [ECF No. 37] to U.S Bank's MSJ [ECF No. 30] on September 5, 2018, and an Errata [ECF No. 43] to the Notice of Corrected Image/Document [ECF No. 42] on September 6, 2018.

24

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

25

26

27

28

<sup>1</sup> HOA's counsel, Christopher B. Anthony, Esq. of the law firm of Boyack Orme & Anthony, agreed to the extension of the deadline requested herein on September 12, 2018, and approved the initial draft of the proposed Stipulation and Order ("SAO") drafted by SFR's counsel, Diana S. Ebron, Esq. of the law firm of Kim Gilbert Ebron. However, after a few minor revisions were added to the SAO by U.S Bank's counsel, Michael Paretti, Esq. of the law firm of Snell & Wilmer LLP, SFR's counsel once again contacted Mr. Anthony for approval of the final version of the SAO, but did not receive a response before the filing deadline. Therefore, pursuant to LR 7-1(c), the final version of the SAO is being filed with the Court as a Joint Motion by U.S. Bank and SFR, with the signature block for HOA's counsel removed.

### KIMGILBERT EBRON 7625 DEAN MARTIN DRIVE, SUITE 110 LAS VEGAS, NEVADA 89139

Pursuant to LR 7-2(b), the current deadline for the parties to file their Replies in support of their respective MSJs, as well as U.S. Bank's Response to SFR's Objection, is September 12, 2018. The parties have mutually agreed to extend this deadline by one week to **September 19, 2018**.

The parties request additional time so that they may adequately and fully address the arguments presented by the parties in their respective Responses [ECF Nos. 34, 35, 36, 37, 41 & 42].

The parties submit this Stipulation and Order in good faith and not for purposes of delay or to prejudice any party.

DATED this 12th day of September, 2018.

### KIM GILBERT EBRON

### SNELL & WILMER LLP

## /s/ Diana S. Ebron DIANA S. EBRON, ESQ. Nevada Bar No. 10580 E-Mail: diana@kgelegal.com KIM GILBERT EBRON 7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139-5974 Attorney for Defendant/Counterclaimant/ Cross-Claimant, SFR Investments Pool 1, LLC

/s/ Michael Paretti
Michael Paretti, Esq.
Nevada Bar No. 13926
E-Mail: mparetti@swlaw.com
SNELL & Wilmer LLP
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169-0965
Attorney for Plaintiff/Counter-Defendant,
U.S. Bank National Association, as Trustee for
Banc of America Funding 2006-G Trust

### ORDER

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE Dated: September 13, 2018.